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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)	
)	
Amendment of Section 2.106 of the)	ET Docket No. 95-18
Commission's Rules to Allocate)	RM-7927
Spectrum at 2 GHz For Use)	
By the Mobile-Satellite Service)	DOCKET FILE COPY ORIGINAL

COMMENTS ON MOTION FOR EXTENSION OF TIME

COMSAT Corporation ("COMSAT"), through its COMSAT Mobile Communications Division, hereby submits its comments in support of the "Motion for Extension of Time" ("Motion") filed on February 22, 1995, by American Mobile Satellite Corporation ("AMSC") in the above-captioned proceeding. AMSC requests an extension of time for filing comments on the Notice of Proposed Rule Making ("NPRM") in ET Docket No. 95-18 from March 9, 1995 until May 5, 1995 and seeks an extension of the reply comment date in this proceeding from March 27, 1995 until June 6, 1995. COMSAT fully supports AMSC's Motion.

As AMSC has demonstrated, there is a need for additional time to enable interested parties to fully consider the complex spectrum allocation and relocation issues raised in the NPRM. At present, members of the Mobile Satellite Service ("MSS") industry are undertaking a series of meetings with representatives of the broadcast and fixed microwave user groups which currently occupy the 2 GHz bands proposed for allocation to MSS. These meetings are providing the parties with valuable information on the usage and deployment of facilities in the 2 GHz bands which will be useful in the preparation of comments on the NPRM. Indeed,

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assuming that an extension is granted, COMSAT hopes to use this information to conduct computer simulations showing the potential for interference from terrestrial transmitters into the MSS uplink and from MSS downlink operations into terrestrial receivers.

In addition, as AMSC noted, many of the parties which are likely to file comments and reply comments in the instant proceeding must devote considerable time and resources over the next month to meetings and Commission proceedings related to the preparation for the 1995 World Radiocommunication Conference ("WRC-95"). The outcome of these activities, including the Industry Advisory Committee meetings, the Informal Industry Working Groups, the Conference Preparatory Meeting ("CPM") scheduled for March 22, 1995 to April 5, 1995, and the comments and reply comments submitted in IC Docket No. 94-31, are directly relevant to the proposals made by the Commission in the instant proceeding.¹ Accordingly, an extension will permit the information gained through these activities to be incorporated into the comments filed in the above-captioned proceeding, thereby making the comments more meaningful to the Commission.

COMSAT appreciates the Commission's efforts to initiate a NPRM to allocate spectrum at 2 GHz for use by MSS. Such action is consistent with the results of the 1992 World Administrative

¹The comments and replies in IC Docket No. 94-31 are currently due to be filed with the Commission on March 6, 1995 and March 21, 1995, respectively. On February 24, 1995, COMSAT filed a motion to extend the reply comment deadline in IC Docket No. 94-31 until April 14, 1995.

Radio Conference which took place over two years ago. However, we are concerned that, without an extension, the short comment and reply period proposed by the Commission will inhibit full consideration of the complex spectrum sharing and transition issues raised in the NPRM.

For the reasons set forth above, COMSAT submits that the extension of time requested by AMSC would be in the public interest and, thus, respectfully requests that the Commission grant AMSC's Motion to extend the time for filing comments and reply comments in the above-captioned proceeding until May 5, 1995 and June 6, 1995, respectively.

Respectfully submitted,

COMSAT CORPORATION

By:


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February 27, 1995

CERTIFICATE OF SERVICE

I, Pamela L. Sonnevile, hereby certify that the foregoing "Comments on Motion for Extension of Time" was served by first-class mail, postage prepaid, this 27th day of February, 1995, on the following persons:

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